

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

IN RE: ARC AIRBAG
INFLATORS PRODUCTS
LIABILITY LITIGATION

MDL No. 3051

Case No: 1:22-MD-3051-ELR

District Judge Eleanor L. Ross

**SPECIALLY APPEARING DEFENDANT VOLKSWAGEN
AKTIENGESELLSCHAFT’S MOTION TO DISMISS THE
CORRECTED CONSOLIDATED CLASS ACTION COMPLAINT**

Pursuant to Federal Rules of Civil Procedure 12(b)(1), 12(b)(2) and 12(b)(6), Defendant Volkswagen Aktiengesellschaft (“VW Germany”) hereby moves to dismiss the Corrected Consolidated Class Action Complaint (“CCAC”) (ECF 157). VW Germany incorporates by reference the Declaration of Magnus Weiss in Support of Specially Appearing Defendant AUDI AG’s Motion to Dismiss for Lack of Personal Jurisdiction (ECF 305-3) and the relevant arguments of Certain Defendants’ Motion to Dismiss (ECF 181, 181-1), Volkswagen Group of America, Inc.’s Motion to Dismiss (ECF 182, 182-1) and Audi of America, LLC’s Motion to Dismiss (ECF 184, 184-1), including the Declaration of Peter Green (ECF 184-2). For the reasons set forth in the accompanying Memorandum of Law and those in the incorporated motions and

supporting papers, this Court should dismiss the CCAC with prejudice and grant such other and further relief as it deems just and proper.

Dated: February 28, 2025

Respectfully Submitted,

/s/ Livia M. Kiser

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